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11/08/2010 11:01 PM

To OW-Docket@EPA

cc

bcc

Subject EPA - PO3-OW-2010-0736: re: Bay State WIPs

Dear Administrator Jackson,

Waterfront Partnership of Baltimore Inc., an organization comprised of businesses and attractions lining Baltimore's Harbor, Harbor East and portion of Fells Point areas, is writing to voice its strong support for the Bay wide TMDLs that are proposed as part of the WIPs for Bay states.

The establishment of the Bay TMDL [Total Maximum Daily Load] marks a tremendous turning point in restoring the Chesapeake Bay by capping the total amount of discharged pollutants. To ensure that state allocations and the overall Bay TMDL are met, EPA has established a new accountability framework that represents the first real opportunity to hold the Bay jurisdictions accountable for their promises to reduce pollution and clean up the Bay.

While we are fortunate that Baltimore's Inner Harbor transformation in the mid-seventies created a major new tourism industry for Baltimore and the region, we are proposing another major transformation for the Harbor - to make it swimmable and fishable by 2020. To help ensure we get there, the Partnership recently commissioned the creation of a comprehensive plan to make the Harbor healthy again - with milestones and measurements to make sure progress is being made each year. Along with the consultants, we have hired University of Maryland Center for Environmental Science to help us prepare a baseline report and annual State of the Harbor Report Card. Also, a respected marketing expert from the area has been hired to prepare a major public education campaign that we will launch in cooperation with area watershed organizations and the City.

We recognize that reaching our goal requires money - significant amounts of it. We have indicated our support for a Storm Water Fee or Utility to Mayor Rawlings-Blake and to our State legislators. We agree that businesses, developers and other commercial interests will have to pay their fair share to assist in stream restoration projects, storm water retrofitting, removal of impervious surfaces and installation of BMPs and the like.

It is imperative that this work get underway immediately. We will be greatly assisted by the preparation of acceptable WIPs by Bay States and by cities within the Bay States; and by assertive enforcement by the EPA. We are very heartened by the seriousness with which EPA is attacking this problem and pledge our support to helping. The two areas which we would only ask that greater attention be paid are to a] indicators: we understand nutrients are a major challenge for the Bay; at the Harbor as in other urban areas, bacteria and trash are also major problems, and we would ask that some additional attention be paid to these pollutants; b] funding: as mentioned before, Baltimore City is considering creating a Storm Water Fee or Utility, which we support. We would urge EPA however to work with the President and Congress to increase funding for Stormwater infrastructure upgrades.

In closing we again want to thank you for your strong, assertive approach to restoring the Chesapeake Bay. Working together we believe we can restore this national treasure to a healthy and vibrant waterway once again.

Please don't hesitate to call on the Waterfront Partnership if we can help in any way.

Best,

Laurie Schwartz

Executive Director

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